



INAC, Nunavut District  
P.O Box 100  
Building 918  
Iqaluit, Nu. X0A 0H0

Our File: 3BM General

Your File: \_\_\_\_\_

CIDM: 394227

May 6, 2010

Roy Green  
Director, Community Infrastructure  
Department of Community & Government Services  
P.O. Box 1000, Station 700  
Iqaluit, Nunavut X0A 0H0

Mr. Green,

I am writing today to follow-up on Indian and Northern Affairs' (INAC) commitment to provide the Government of Nunavut and specifically the Department of Community and Government Services (C.G.S) an opportunity to address the outstanding issues of Non-Compliance identified to your offices over the last three years.

In November of 2009 in a meeting with representatives of INAC and Environment Canada (EC), C.G.S committed to providing a priority action plan to both INAC and EC. This action plan was to include a chronological list of priorities and attached timelines which the Government of Nunavut would action so to come into compliance with the Nunavut Water and Nunavut Surface Rights Tribunal Act. At that time C.G.S committed to providing the plan to INAC and EC by January 30<sup>th</sup>, 2010.

Our most recent meeting of March 9<sup>th</sup>, 2010 was necessary partly to assist the Field Operations Section of INAC build an awareness of the obstacles that C.G.S is facing in dealing with issues identified in the 2007, 2008 and 2009 Inspections of Municipal facilities as well as to identify factors contributing to the delay in supplying the plan.

Given that the information on recurring Non-compliance in each community has previously been provided to your offices, it is not necessary here, to get into great detail. However, in broad strokes a number of administrative trends have appeared that are common to most files, including;

- Failure to file Annual Report,
- Failure to submit sample results,
- Failure to develop and follow Operations Manuals,
- Failure to submit and follow Spill Contingency Plans,
- Failure to submit Compliance Plans,
- Failure to submit Quality Control and Assurance Plans, and
- Failure to submit Abandonment and Restoration Plans (as and when required).

Additionally, a number of Operational issues have been identified as being common to communities, such as;



- Failure to collect samples,
- Failure to maintain signage,
- Failure to maintain a 1 meter freeboard within a lagoon,
- Failure to segregate municipal waste,
- Failure to adequately store (within) and remove hazardous wastes,
- Failure to properly manage solid wastes,
- Failure to manage ground water within solid waste areas, and
- Failure to maintain infrastructure (to prevent failures).

Finally, a number of communities remain unlicensed while others have infrastructure issues that have either caused failures, or are at risk of failing. These communities have been identified to your offices in Inspection Reports previously and it is expected that these issues will be addressed in the required Action Plan and list of priorities.

The plan, once provided, will be an invaluable tool to the Inspector's this field season when measuring their enforcement response options to violations of the Act found during the Inspection process. Knowing that an issue is being addressed can reduce the risk and thus the response option necessary to address it.

Given the above, INAC's Field Operations Section requests that the committed to Action Plan and list of priorities be provided to our offices no later than May 21<sup>st</sup>, 2010 so that it may be incorporated into the inspection planning and risk assessment process for this year's inspection season.

Thank you very much for your continued assistance and cooperation. I look forward to working with you and your staff over the up-coming field season to address these deficiencies and to working toward achieving and maintaining compliance with the Legislation.

If you have any questions or concerns, please do not hesitate to contact either myself or our offices here in Iqaluit at your earliest convenience.

Sincerely,

(Original Mailed this date)

***APK***\_\_\_\_\_

Andrew Keim  
Water Resources Officer  
INAC Nunavut Regional Office  
P.O. Box 100  
Iqaluit, Nunavut X0A 0H0  
\*NEW Email:\* [Andrew.Keim@inac-ainc.gc.ca](mailto:Andrew.Keim@inac-ainc.gc.ca)  
Phone: (867) 975-4289 Fax: (867) 979-6445

CC:

Peter Kusugak – Manager – Field Operations Section  
Phyllis Beaulieu – Manager Licensing- Nunavut Water Board.